

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DEFENDANTS' MOTION FOR
PROTECTIVE ORDER
CONCERNING PLAINTIFFS'
SUBPOENAS TO THIRD-PARTY
MANUFACTURERS OF PATIENT
WARMING DEVICES**

Pursuant to Federal Rule of Civil Procedure 37(b)(2)(A)(vii) and Local Rules 7.1 and 37.1, Defendants 3M Company and Arizant Healthcare Inc. (collectively "Defendants") respectfully move the Court for a protective order (i) barring Plaintiffs from pursuing discovery from the third-party manufacturers that Plaintiffs subpoenaed on February 17, 2017, to the extent that discovery concerns conductive patient warming devices; and (ii) barring Plaintiffs from pursuing discovery concerning any convective warming devices sold by these companies unless and until Plaintiffs demonstrate that some component of those devices could be incorporated into the 3M™ Bair Hugger™ system.

Dated: March 10, 2017

Respectfully submitted,

s/Benjamin W. Hulse

Jerry W. Blackwell (#186867)

Benjamin W. Hulse (#0390952)

Mary S. Young (#0392781)

**Attorneys for Defendants 3M Company
and Arizant Healthcare Inc.**

BLACKWELL BURKE P.A.

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

T: (612) 343-3200 F: (612) 343-3205

blackwell@blackwellburke.com

bhulse@blackwellburke.com

myoung@blackwellburke.com

Bridget M. Ahmann (#016611x)

**Attorney for Defendants 3M Company
and Arizant Healthcare Inc.**

FAEGRE BAKER DANIELS LLP

2200 Wells Fargo Center

90 South Seventh Street

Minneapolis, MN 55402

T: (612) 766-7000 F: (612) 766-1600

bridget.ahmann@faegrebd.com